

REMARKS

Claims 19-41 are added herein. Claims 1-41 now remain pending in the application.

Claim 5 over Ramasubramani

In the Office Action, claim 5 was rejected under 35 U.S.C. §102(b) as allegedly being anticipated by Ramasubramani et al. U.S. Patent No. 6,507,589 ("Ramasubramani"). The Applicants respectfully traverse the rejection.

Claim 5 recites a remotely manageable protocol gateway.

Ramasubramani appears to disclose techniques for routing messages to addressable portions, e.g., processes, within an apparatus (Abstract). The techniques can be performed by a variety of apparatus including, e.g., a gateway, a proxy server or a mobile device (Abstract). A multi-network gateway is able to couple various wireless carrier networks with different network characteristics to the Internet regardless of the differences in the wireless carrier networks (Ramasubramani, col. 6, lines 10-24).

Ramasubramani discloses a multi-network gateway coupling various wireless carrier networks to the Internet. However, to perform any updates to, e.g., network processes, conventional methods require a field technician to physically travel to a multi-network gateway and perform any required updates. Ramasubramani fails to disclose or suggest anything other than conventional update methods being used to update the multi-network gateway. Ramasubramani fails to disclose or suggest remotely manageable protocol gateway, as recited by claim 5.

Accordingly, for at least all the above reasons, claim 5 is patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claims 1-4 and 6-11 over Ramasubramani in view of Boyle

In the Office Action, claims 1-4 and 6-11 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Ramasubramani in view of Boyle et al. U.S. Patent No. 6,138,158 ("Boyle"). The Applicants respectfully traverse the rejection.

Claims 6-11 are dependent on claim 5, and are allowable for at least the same reasons as claim 5.

Claims 1-4 recite a protocol gateway comprising a means for authenticating an origin of a message, wherein the authenticating means authenticates the origin before the message is routed by a message router, and a database, which is accessible by a message router and adapted to store information relating to routing and authentication of the message.

The Office Action acknowledges that Ramasubramani fails to disclose a means for authenticating an origin of a message, wherein the authenticating means authenticates the origin before the message is routed by a message router, and a database, which is accessible by a message router and adapted to store information relating to routing and authentication of the message. The Office Action relies on Boyle to allegedly make up for the deficiencies in Ramasubramani to arrive at the claimed invention. The Applicants respectfully disagree.

Boyle appears to disclose a method and apparatus for navigation of Internet web pages using two-way interactive communication devices (Abstract). When one or more pages of information are updated, rather than sending the entire updated information through the network, notification is sent to users using a narrowband channel (Boyle, Abstract). Users then fetch the updates through a wideband channel (Boyle, Abstract). To obtain updates, a request to establish a communication with a link server device comprises a device ID of a mobile device and a URL provided in a push message (Boyle, col. 14, lines 21-26).

Boyle discloses a link server device that utilizes a device ID to obtain updates. Modifying Ramasubramani with Boyle would result in Ramasubramani utilizing a link server device that utilizes a device ID to obtain

updates **NOT** a protocol gateway comprising a means for authenticating an origin of a message, wherein the authenticating means authenticates the origin before the message is routed by a message router, and a database, which is accessible by a message router and adapted to store information relating to routing and authentication of the message, as recited by claims 1-4.

Moreover, Boyle discloses a link server device that utilizes a device ID to obtain updates. However, Boyle fails to disclose or suggest use of a protocol gateway, much less a protocol gateway comprising a means for authenticating an origin of a message, wherein the authenticating means authenticates the origin before the message is routed by a message router, and a database, which is accessible by a message router and adapted to store information relating to routing and authentication of the message, as recited by claims 1-4.

The Examiner alleges that authenticating an origin of messages by routers is well known in the art (Office Action, page 5). Thus, given the teaching of Boyle, it would have been obvious to modify Ramasubramani in order to provide data identification while maintaining a secure system (Office Action, page 5). However, "Teachings of references can be combined only if there is some suggestion or incentive to do so." In re Fine, 5 USPQ2d 1596,1600 (Fed. Cir. 1988) (quoting ACS Hosp. Sys. v. Montefiore Hosp., 221 USPQ 929, 933 (Fed. Cir. 1984)) (emphasis in original). Ramasubramani fails to disclose or suggest a deficiency that would benefit from providing data identification while maintaining a secure system. Thus, any such modification is based on impermissible hindsight.

Claims 6-11 recite a remotely manageable protocol gateway.

Claims 6-11 are dependent on claim 5, and are allowable for at least the same reasons as claim 5.

As discussed above, Ramasubramani fails to disclose or suggest a remotely manageable protocol gateway, as recited by claims 6-11.

The Office Action relies on Boyle to allegedly make up for the deficiencies in Ramasubramani to arrive at the claimed invention. The Applicants respectfully disagree.

Boyle appears to disclose a link server device that connects a client device and a Web server device (Fig. 2). The link server services a narrowband channel and a wideband channel connected to a client device (Boyle, Fig. 2). However, Boyle fails to disclose or suggest that the link server is remotely manageable, much less disclose or suggest a remotely manageable protocol gateway, as recited by claims 6-11.

Neither Ramasubramani nor Boyle, either alone or in combination, disclose, teach or suggest a remotely manageable protocol gateway, as recited by 6-11.

Accordingly, for at least all the above reasons, claims 1-4 and 6-11 are patentable over the prior art of record. It is therefore respectfully requested

Claims 12-18 over Ramasubramani in view of Mann

In the Office Action, claims 12-18 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Ramasubramani in view of Mann et al. U.S. Patent No. 5,167,035 ("Mann"). The Applicants respectfully traverse the rejection.

Claims 12-15 recite segmenting a message into one or more message segments by one of a plurality of client devices, none of the message segments exceeding a maximum segment size and determining that at least one message segment constitutes a complete message by one of the plurality of client devices.

The Office Action acknowledges that Ramasubramani fails to disclose segmenting a message into one or more message segments within one of a plurality of client devices, none of the message segments exceeding a maximum segment size and determining that at least one message segment constitutes a complete message at one of the plurality of client devices.

The Office Action relies on Mann to allegedly make up for the deficiencies in Ramasubramani to arrive at the claimed invention. The Applicants respectfully disagree.

Mann appears to disclose a message transfer arrangement that includes a client node and a server node interconnected by a data link (Fig. 1). An association control block controlling the transfer of messages in a server includes a field that identifies the maximum size of a message segment (Mann, col. 9, lines 28-30). The association layer in a server uses the contents of the segment size field in dividing a command or response message into fixed size command or response message segments (Mann, col. 9, lines 30-33).

The Examiner alleges Mann discloses segmenting a message into one or more message segments within one of a plurality of client devices. However, Mann at Mann, col. 9, lines 28-33 discloses a server dividing a command or response **NOT** a client device, as recited by claims 12-15.

Moreover, the Office Action points to Mann, col. 5, lines 30-49 to disclose a client device that determines at least one message segment constitutes a complete message. However, Mann discloses sending and receiving messages within the system, never mentioning any device determining at least one message segment constitutes a complete message, much less by a client device, as recited by claims 12-15.

Neither Ramasubramani nor Boyle, either alone or in combination, disclose, teach or suggest segmenting a message into one or more message segments within one of a plurality of client devices, none of the message segments exceeding a maximum segment size and determining that at least one message segment constitutes a complete message at one of the plurality of client devices, as recited by claims 12-15.

Claims 16-18 recite segmenting a message into one or more message segments by one of a plurality of protocol gateways, none of the message segments exceeds said maximum segment size and determining that at least one message segment constitutes a complete message at one of a plurality of client devices.

The Examiner acknowledges that Ramasubramani fails to disclose segmenting a message into one or more message segments within one of a plurality of protocol gateways, none of the message segments exceeds said maximum segment size and determining that at least one message segment constitutes a complete message at one of a plurality of client devices. The Office Action relies on Mann to allegedly make up for the deficiencies in Ramasubramani to arrive at the claimed invention. The Applicants respectfully disagree.

The Examiner acknowledges that a server node defines a maximum segment size, determines if a message exceeds a maximum segment size, and segmenting the message into one or more message segments, none of which exceeds a maximum segment size (Office Action, page 13). However, a server node defining a maximum segment size, determining if a message exceeds a maximum segment size, and segmenting a message into message segments is **NOT** a protocol gateway defining a maximum segment size, determining if a message exceeds a maximum segment size, and segmenting a message into message segments, as recited by claims 16-18.

Moreover, as discussed above, the Office Action points to Mann, col. 5, lines 30-49 to disclose a client device that determines at least one message segment constitutes a complete message. However, Mann discloses sending and receiving messages within the system, never mentioning any device determining at least one message segment constitutes a complete message, much less by a client device, as recited by claims 16-18.

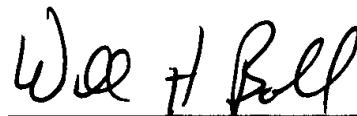
Neither Ramasubramani nor Boyle, either alone or in combination, disclose, teach or suggest segmenting a message into one or more message segments by one of a plurality of protocol gateways, none of the message segments exceeds said maximum segment size and determining that at least one message segment constitutes a complete message at one of a plurality of client devices, as recited by claims 16-18.

Accordingly, for at least all the above reasons, claims 12-18 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,
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A handwritten signature in black ink, appearing to read "W H Bollman", written over a horizontal line.

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